

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

STRAGENT, LLC, ET AL.,

§

Plaintiffs,

§

v.

§

INTEL CORPORATION,

§

Defendant.

§

§

Civil Action No. 6:11-cv-421-TBD-JDL

**INTEL CORPORATION'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
SUBMIT ITS BILL OF TAXABLE COSTS**

Defendant Intel Corporation hereby moves for an order extending the deadline to submit its motion for taxable costs. The Court entered final judgment on April 8, 2014, and ordered that Intel's costs of court be taxed against Plaintiff Stragent LLC. [Dkt. 344] The judgment further directed the parties to Local Rule No. CV-54 and the Standing Order Regarding Bill of Costs, which sets out the need for the parties to make sincere efforts to reach agreement on matters related to cost applications. Under LR CV-54, unless otherwise directed by the Court, a motion for taxable costs is due 14 days from the entry of judgment, which would be April 22, 2014. The parties have commenced but not completed the exchange of information and dialogue specified in the Court's local rules and standing order and would benefit from having additional time to attempt to eliminate or minimize disputes about some of the categories of costs that Intel is seeking—disputes that would otherwise need to be presented to the Court for resolution.

Accordingly, Intel respectfully requests that the deadline for its costs motion be extended by 13 days, from April 22 to May 5, 2014. Stragent does not oppose this motion.

Dated: April 18, 2014

Respectfully submitted,

/s/Michael E. Jones
Chad S. Campbell
cscampbell@perkinscoie.com
Dan L. Bagatell
dbagatell@perkinscoie.com
Aaron H. Matz
amatz@perkinscoie.com
Tyler R. Bowen
tbowen@perkinscoie.com
PERKINS COIE LLP
2901 North Central Avenue, Suite 2000
Phoenix, Arizona 85012-2788
Tel.: (602) 351-8000
Fax: (602) 648-7000

David J. Burman
dburman@perkinscoie.com
Michael D. Broaddus
mbroaddus@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, 48th Floor
Seattle, Washington 98101
Tel.: (206) 359-8000
Fax: (206) 359-9000

Michael E. Jones
mikejones@potterminton.com
John Bufo
johnbufe@potterminton.com
Allen Gardner
allengardner@potterminton.com
POTTER MINTON
110 N. College Avenue, Suite 500
Tyler, Texas 75702
Tel.: (903) 597-8311
Fax: (903) 593-0846

Robert Christopher Bunt
rcbunt@pbatyler.com
PARKER, BUNT & AINSWORTH, P.C.
100 East Ferguson, Suite 1114
Tyler, Texas 75702
Tel.: (903) 531-3535
Fax: (903) 533-9687

Attorneys for Defendant Intel Corporation

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document will be served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), any counsel of record not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by regular U.S. mail on April 18, 2014.

/s/Michael E. Jones